

Unsealed on 8/2/12

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

FILED

12 JUL 25 AM 10:00

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff

vs.

Isaac Symeon BRAGG,
Defendant.

Case Number:

'12MJ2779

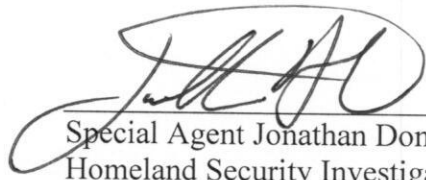
COMPLAINT FOR VIOLATION OF:

Title 18, United States Code
Section 2251(a)-
Sexual Exploitation of a Child
(Felony):

The undersigned complainant being duly sworn states:

That in or about April 2010, within the Southern District of California, defendant Isaac Symeon BRAGG did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in or affecting interstate and foreign commerce by any means; in violation of Title 18, United States Code, Sections 2251(a) and (e).

And the complainant states that this complaint is based on the attached statement of facts, incorporated herein by reference.


Special Agent Jonathan Donaher
Homeland Security Investigations

Sworn to before me and subscribed in my presence this ^{25th} day of July 2012.


UNITED STATES MAGISTRATE JUDGE

KAREN S. CRAWFORD

Handwritten initials

On April 26, 2010, San Diego Police Department (SDPD) Vice Detective James Hunter received information that 30 year-old BRAGG was in contact with a minor female (MF), age 17, and her five month old baby. Detective Hunter contacted MF's mother who believed MF was working as a prostitute because she found her posting advertisements for prostitution on backpage.com. The mother then emailed Detective Hunter the information she had found from backpage.com. Specifically, she emailed Detective Hunter an online posting from April 19, 2010. It was titled "100 Incall Special" and listed MF's cell phone number (619-600-xxxx) with a name of "Sara".

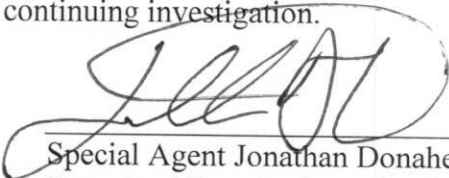
Further investigation revealed that the person depicted in the ads was MF. One in particular was Backpage posting #6086228. This was an advertisement for purposes of prostitution and depicted several naked pictures of MF using the name "Sara" and telephone number 619-600-6978. This was MF's known telephone number.

On May 6, 2010, at 7:52 PM, BRAGG exited a building after meeting with his parole officer and walked directly to MF and began intimately kissing her for a few seconds. Then he walked to the driver side door and opened it. At this time, Gang Suppression Team (GST) Officers Tivanian #5871 and Swadner #5753, whom Detective Hunter had on standby, arrested BRAGG without incident for a parole violation. He was transported to SDPD Headquarters for booking.

At the time of Bragg's arrest, Bragg had a cell phone - Samsung Model R450 cell phone with telephone number 619-761-xxxx - on his person. It was manufactured in China. Detective Hunter downloaded the phone using the Cellebrite system. Several pictures of MF were found on BRAGG's cell phone. These included the exact pictures that were posted online in the Backpage advertisement in which MF was being sold as a prostitute. The pictures depict MF completely naked in a bathtub. In some of the pictures, her vagina and buttocks are the focus of the picture. MF was shown these pictures, and she denied that they were of her. However, her face is visible in the pictures, and it is clearly her. I believe these photographs constitute child pornography as defined in 18 U.S.C. § 2256. According to the phone entry, the pictures were taken in April 2010.

REQUEST FOR SEALING

It is further respectfully requested that this Court issue an Order sealing, until further order of this Court, all papers submitted in support of this complaint, including the probable cause statement and arrest warrant. Sealing is necessary because premature disclosure of the contents of this probable cause statement and related documents may cause the defendant to flee and may cause the destruction of evidence and may have a negative impact on this continuing investigation.


Special Agent Jonathan Donaher
Homeland Security Investigations